

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED: _____
LANCE TOBIN	:	VIOLATION:
	:	18 U.S.C. § 1349 (conspiracy to commit
	:	mail fraud - 1 count)
	:	18 U.S.C. § 1957 (money laundering – 2
	:	counts)
		Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The victim company, known to the United States Attorney, was an investment management group that managed trillions of dollars in assets for account holders throughout the world.
2. For instances where account holders died without leaving any heirs, the victim company utilized an escheatment process to ensure the proper transfer of any funds from dormant accounts to the appropriate state, in accordance with applicable state and federal law.
3. S.C., known to the United States Attorney, was an employee of the victim company. Through his employment at one of the victim company's offices in the Eastern District of Pennsylvania, S.C. had access to dormant accounts which were due for escheatment.
4. From at least on or about June 1, 2012 to at least on or about April 21, 2014, S.C. devised and intended to devise a scheme and artifice to defraud and to obtain money

and property by means of false and fraudulent pretenses, representations and promises.

The Conspiracy

5. From on or about June 1, 2012 to at least on or about April 21, 2014, in Philadelphia, Richboro, Wayne, and elsewhere in the Eastern District of Pennsylvania, defendant

LANCE TOBIN,

together with S.C. and others, known and unknown to the United States Attorney, conspired and agreed to knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and to use the U.S. Mails to further the scheme to defraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS

6. S.C. abused his position at the victim company to improperly and unlawfully access certain dormant accounts due for escheatment.

7. S.C. unlawfully caused the victim company to issue checks drawn on these dormant accounts to defendant LANCE TOBIN and others, known and unknown, even though, as S.C. and defendant TOBIN well knew, this money belonged to the victim company and was not due to S.C., defendant TOBIN, or the other members of the conspiracy.

8. S.C. caused the victim company to send these checks, via U.S. mail, to defendant LANCE TOBIN and others, known and unknown, even though, as S.C. and defendant TOBIN well knew, this money belonged to the victim company and was not due to S.C., defendant TOBIN, or the other members of the conspiracy.

9. Upon receipt of these checks, defendant LANCE TOBIN deposited the stolen funds into one of several accounts that he maintained and controlled at Citizens Bank,

which was a financial institution as defined by 31 U.S.C. § 5312(a)(2).

10. After depositing the checks, defendant LANCE TOBIN issued checks drawn on one of the Citizens Bank accounts to S.C., knowing that this money was criminally derived, and provided the checks to S.C.

11. After receiving the checks from defendant LANCE TOBIN, S.C., knowing that this money was criminally derived, deposited the checks into a PNC Bank account that he controlled.

OVERT ACTS

In furtherance of this conspiracy, defendant LANCE TOBIN committed the following overt acts, among others:

1. On or about August 8, 2012, defendant LANCE TOBIN issued a personal check to S.C. in the amount of \$5,000.
2. On or about September 5, 2012, defendant LANCE TOBIN issued a personal check to S.C. in the amount of \$7,200
3. On or about August 12, 2013, defendant LANCE TOBIN issued a personal check to S.C. in the amount of \$270,000.
4. On or about April 21, 2014, defendant LANCE TOBIN issued a personal check to S.C. in the amount of \$555,200.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO AND THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about the dates set forth below, in the Eastern District of Pennsylvania, and elsewhere, defendant

LANCE TOBIN

knowingly engaged and attempted to engage in the following monetary transactions through Citizens Bank, in criminally derived property of a value greater than \$10,000, that is the issuance of personal checks to S.C., such property having been derived from a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Sections 1341 and 1349:

COUNT	DATE OF CHECK ISSUANCE	AMOUNT PAYABLE ON CHECK
2	August 12, 2013	\$270,000
3	April 21, 2014	\$555,200

All in violation of Title 18, United States Code, Section 1957.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1341, 1349, and 1957 set forth in this information, defendant

LANCE TOBIN

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to, a sum of \$1,891,398.03.

2. Such property shall include, but not be limited to, the following:

- a. Money Judgment. A sum of money equal to \$\$1,891,398.03 in United States currency, representing the amount of proceeds obtained as a result of the mail fraud charged in Count One.
- b. Bank Accounts. All funds under the control of S.C., including the bank account at PNC with an account number ending in 2599.
- c. Real Property. The real property located at 631 Proctor Lane, Coatesville, Pennsylvania and 6 Pine Terrace, Berlin, New Jersey.

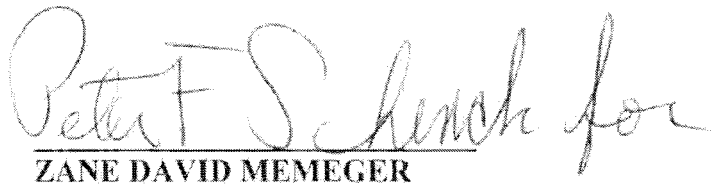
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA v. LANCE TOBIN	CRIMINAL ACTION NO. 16-304
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ORDER

AND NOW, this 16th day of October, 2018, the Information in this case shall be unsealed. The sealing order will remain as to other docket entries, for good cause shown.

BY THE COURT:

/s/ Michael M. Baylson

Michael M. Baylson, U.S.D.J.

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A TRUE COPY CERTIFIED FROM THE RECORD

DATED: 10/17/18

ATTEST: *[Signature]*
DEPUTY CLERK UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

